

BEFORE THE NATIONAL GREEN TRIBUNAL
NEW DELHI
ORIGINAL APPLICATION NO. 327/2022

IN THE MATTER OF:

AMRAVATI FLY ASH BRICKS MANUFACTURERS
ASSOCIATION

...APPLICANT

VS.

UNION OF INDIA & ORS.

...RESPONDENTS

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ADVOCATE FOR THE RESPONDENT NO.11:

SUDHANSHU PRAKASH

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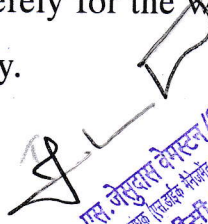
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...RESPONDENTS

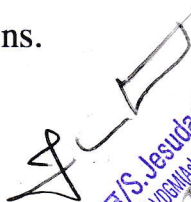
**SHORT REPLY ON BEHALF OF THE RESPONDENT NO. 11 (NTPC-
KAHALGAON SUPER THERMAL POWER STATION)**

MOST RESPECTFULLY SHOWETH:

1. The Respondent No.11 (NTPC-Kahalgaon Super Thermal Power Station) is filing the present short Reply to the captioned Original Application through, Mr.Jesudas Wemston , working as DGM (ADM) with the Respondent No. 11/Answering Respondent who is fully competent to sign, verify, institute, depose and file the present reply on behalf of the Respondent No. 11 and to do all necessary acts for the purpose of present proceedings vide Authorization Letter dated 17/03/2025 . The true copy of the Authorisation Letter dated 17/03/2025 is attached herewith and marked as **Annexure- R/1**
2. That at the outset, the Respondent No.11 denies each and every averment, statement, allegation and contention made in the caption Original Application against the Respondent No. 11 which are inconsistent with the contents of the present Reply and save those which are specifically admitted hereinafter. Further nothing contained in the Original Application may be treated as admitted by the Respondent No. 11 merely for the want of specific traverse, unless specifically admitted in this reply.


 स. जेसुदास वेमस्टन / S. Jesudas Wemston
 डी.जी.एम. (एडमिनिस्ट्रेशन) / DGM (ADM)
 एनटीपीसी लिमिटेड / NTPC Limited
 काहलगाँव, बिहार / Kahalgaon, Bihar

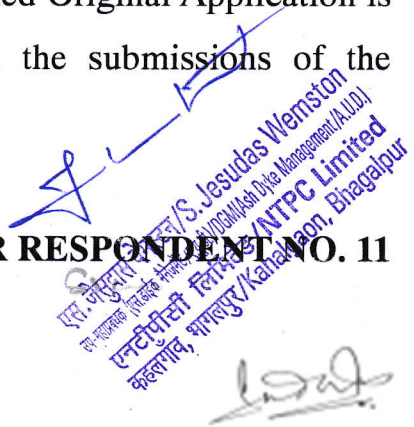
3. The Respondent No -11- NTPC Kahalgaon Super Thermal Power Station in the ER-1 Region, is engaged in the business of generation of electricity and allied activities. The Kahalgaon STPP, located in District of Bhagapur, Bihar, is one of the coal based thermal power station of NTPC Ltd. The total installed capacity of the Kahalgaon STPP is 2,340 MW.
4. That the overarching responsibility for decision-making, operational management, and implementation of policies and practices in relation to all power plants of NTPC Limited lies with Corporate Office. The Corporate Office, as the apex body, oversees and manages the core functions, operational strategy, and compliance of NTPC Limited's power plants across the country, including those in Kahalgaon Super Thermal Power Station.
5. It is therefore submitted that the Respondent No. 11, in principle, adopts the stand of Respondent No. 9, NTPC Corporate Office (which has filed its Statement of Objections in the connected matter i.e., O.A. No. 878/2022), and all necessary submission made by it in the present matter. It is submitted that the Corporate Office is the appropriate entity to address substantive issues concerning the operations, regulatory compliance, and environmental matters of the power plants.
6. That notwithstanding the limited role of Respondent No. 11 in the present Original Application, it is submitted that Respondent No. 11 remains compliant with all applicable norms, regulations, and guidelines pertaining to environmental standards. Respondent No. 11 is duty-bound to support and ensure adherence to such norms to the extent of its administrative responsibilities and functions.


श्री. जेसुदास वेमस्टन / S. Jesudas Wemston
एनटीपीसी लिमिटेड / NTPC Limited
कालगाँव, भागपुर / Kahalgaon, Bhagalpur

7. That the present short reply is being filed to place on record the limited role and scope of responsibilities of Respondent No. 11 in the subject matter of the Original Application. The Respondent No. 11 respectfully reserves its right to file a detailed response, if required, with the leave of this Hon'ble Tribunal, as and when necessary.
8. That Respondent No. 11 submits this reply with utmost respect and commitment to assist this Hon'ble Tribunal in its adjudication of the matter. It is humbly prayed that the submissions of Respondent No. 11 may kindly be taken on record and considered in light of its limited role in the subject matter.
9. That accordingly, the prayers sought in the captioned Original Application is denied, and it is most respectfully prayed that the submissions of the Respondent No. 11 be kindly taken on record.


FOR RESPONDENT NO. 11

THROUGH


SUDHANSHU PRAKASH
ADVOCATE FOR THE RESPONDENT NO.11
F-1, BASEMENT, LAJPAT NAGAR-III
NEW DELHI
MOB: 9205200742
EMAIL: contact.sudhanshuprakash@gmail.com

PLACE: NEW DELHI
DATED: 17.03.2025

BEFORE THE NATIONAL GREEN TRIBUNAL
NEW DELHI

ORIGINAL APPLICATION NO. 327/2022

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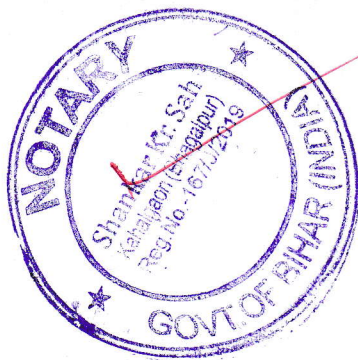
RESPONDENTS



AFFIDAVIT

I, Jesudas Wemston S/o Shri. D. Stephen, working as DGM (ADM) in the office of Respondent No. 11, having its office at NTPC, Kahalgaon, Bhagalpur-813214, Bihar, presently at Kahalgaon do hereby solemnly affirm and state as under:-

1. I say that I am the authorized signatory of the Respondent No. 11 in the present matter and as such am competent to swear the present affidavit.
2. I say that I have read the contents of the above Reply and I have understood the contents of the same.
3. I say that the contents of the above Reply being filed by the Respondent No. 11 are based on the information available with the Respondent No. 11 in the normal course of business and believed by me to be true.
4. That the annexures from R/1 enclosed with the accompanying Reply to the Original Application No. 327/2022 are true copies of their respective originals.



DEPONENT

ए. जेसुदास वेमस्टन/S. Jesudas Wemston
ए. जेसुदास वेमस्टन (पति) श्री. डी. स्टीवन (पत्नी) / A. Jesudas Wemston (Husband) D. Stephen (Wife)
एनटीपीसी लिमिटेड / NTPC Limited
कहलगाँव, भागलपुर / Kahalgaon, Bhagalpur

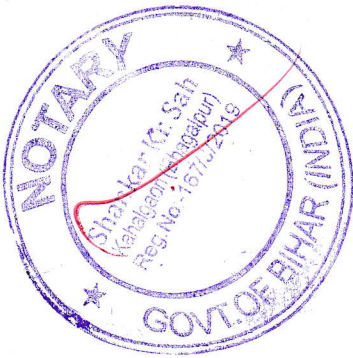
VERIFICATION

I, the deponent above-named, do hereby verify the contents of the above affidavit to be true to the best of my knowledge, no part of it is false and nothing material has been concealed there from.

Verified at Kahalgau on this 17th day of March, 2025.

*Identified by
Prakash Mishra
Advocate*

17-03-2025



[Handwritten Signature]

DEPONENT

एस. जेसुदास वेमस्टन / S. Jesudas Wemston
एनटीपीसी लिमिटेड / NTPC Limited
कलकत्ता, भागलपुर / Kahalgau, Bhagalpur

Shri/Smt. Jesudas Wemston
Who is personally known and
identified by Prakash Mishra
Advocate Personally known and
declare before me.

[Handwritten Signature]
Shanker Kr. Sah
NOTARY PUBLIC
Kahalgau, Bhagalpur (Bihar)

ANNEXURE-R/1**17/3/2025****AUTHORISATION LETTER**

Shri.Jesudas Wemston, Emp:No: 035072, DGM(ADM) is hereby authorised to do all or any of the following acts on behalf of the company with reference to NGT case - OA No: 327/2022 - Amaravati Fly Ash Bricks Manufacturers Association Vs Union of India and OA 878/2022 - Tamilnadu Fly Ash Brick association Vs Union of India and others

1. To sign the vakalatnama, Counter/Reply, Affidavit and any other application & other relevant documents to be filed before NGT, Delhi
2. To attend all necessary and incidental matters in connection to it .


For & on behalf of NTPC, Kahalgaon**(SANDEEP NAIK)****EXECUTIVE DIRECTOR/HEAD OF PROJECT**

कहलगाँव सुपर थर्मल पावर स्टेशन,पो0: कहलगाँव एसटीपी,जिला: भागलपुर,बिहार 813214 टेली;Tel: 06429-226333(0),फैक्स/Fax : 06429-226646

Kahalgaon Super Thermal Power Station, P.o. Kahalgaon STP,Distt. Bhagalpur,Bihar-813214

पंजीकृत कार्यालय : एन टी पी सी भवन,स्कोप कॉम्प्लेक्स,7 इंस्टीट्यूशनल एरिया,लोधी रोड,नई दिल्ली - 110003

Registred Office : NTPC Bhawan Scope Complex, 7 Institutional Area, Lodhi Road,New Delhi - 110003

कारपरेट पहचान नम्बर: L40101DL1975G01007966, टेलीफोन नं0: 011-24361019,फैक्स नं0: 011-24361018,इमेल: ntpccc@ntpc.co.in,वेबसाइट: www.ntpc.co.in

Corporate Identification Number : L4010DL1975G01007966, Telephone No. 011-24361019,Fax No:011-24361018,Email: ntpccc@ntpc.co.in,Website: www.ntpc.co.in